

**SCLH Name:** \_\_\_\_\_ **SCL #** \_\_\_\_\_ **SAR #** \_\_\_\_\_

<b>Element 1:</b> <b>EMS Audit Module</b>  Clear commitment to export control from upper management to all employees involved with export related activities.	Y	N	U	ICP Manual Review SLCD _____ Date _____  Comments (if applicable)	Y	N	On Site Review Date _____  Comments (if applicable)  752.11(c)(1)	F	R
1. Is the commitment statement from senior mgt? Is it signed, dated, and on letterhead? Is it in the ICP?  _____ _____  Does it explain why corporate commitment is important?	-	-	-		-	-		-	-
2. Does it contain a policy statement that no sales will be made contrary to US EAR?  _____ _____  Are all proliferation concerns addressed?	-	-	-		-	-		-	-
3. Does the statement contain a description of penalties applied in instances of compliance failure? By DOC or firm?  _____ _____									
4. Does it contain the name/position and telephone no. of the person to contact with questions on the legitimacy of a transaction or possible violations?  _____ _____									

<p><b>5. Are there written procedures to address:</b></p> <p><b>Is the statement updated and/or reissued? (ie. management change)</b></p> <p>_____</p> <p><b>Is the statement communicated on a regular basis?</b></p> <p>_____</p> <p><b>To whom is the statement disseminated ?</b></p> <p>_____</p> <p><b>Who receives copies of the ICP?</b></p> <p>_____</p> <p>_____</p>	-	-	-		-	-	<p>Rev. 8/96</p>	-	-
<p><b>6. Did the management presentation adequately display the firm's commitment toward compliance with export controls?</b></p> <p>_____</p> <p>_____</p> <p><b>Have adequate resources been committed?</b></p> <p><b>[Go to Audit Module Element #2]</b></p>	-	-	-		-	-	<p>Rev. 8/96</p>	-	-